

)	
FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
)	Case No. SA-98-CA-0629-FB
vs.)	
)	
HOLD BILLING SERVICES, et. al.)	
)	
Defendants.)	
)	

Testimony: Ms. DeSilva will testify about her employment duties and history, fellow employees' duties and responsibilities, LEC billing, billing applications, pre-billing review of potential vendors, implementation, contractual relationships with vendors, policies regarding vendors' marketing, complaints about vendors, monitoring of vendors, authentication and validation, thresholds and threshold breaches, actions taken in response to threshold breaches,

and the admissibility of documents.

Melissa Mitchell

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Ms. Mitchell will testify about her employment duties and history, fellow employees' duties and responsibilities, LEC billing, billing applications, pre-billing review of potential vendors, implementation, contractual relationships with vendors, policies regarding vendors' marketing, complaints about vendors, monitoring of vendors, authorization, authentication and validation, thresholds and threshold breaches, actions taken in response to threshold breaches, and the admissibility of documents.

Sherry Martinez

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Ms. Martinez will testify about her employment duties and history, fellow employees' duties and responsibilities, billing applications, pre-billing review of potential vendors, implementation, and the admissibility of documents.

Blanca DeLeon

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Ms. DeLeon will testify about her employment duties and history, fellow employees' duties and responsibilities, monitoring of vendors, thresholds and threshold breaches, and the admissibility of documents.

Vivian Obledo

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Ms. Obledo will testify about her employment duties and history, fellow employees' duties and responsibilities, thresholds and threshold breaches, actions taken in response to threshold breaches, and the admissibility of documents.

Corinna Ortegon

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Ms. Ortegon will testify about her employment duties and history, fellow employees' duties and responsibilities, thresholds and threshold breaches, and the admissibility of documents.

Amy Oswalt

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Ms. Oswalt will testify about her employment duties and history, fellow employees' duties and responsibilities, monitoring of vendors, and the admissibility of documents.

Adolf Rodriguez

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Mr. Rodriguez will testify about his employment duties and history, fellow employees' duties and responsibilities, complaints about vendors, and the admissibility of documents.

John Wardashki

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Mr. Wardashki will testify about his employment duties and history, fellow employees' duties and responsibilities, thresholds and threshold breaches, actions taken in response to threshold breaches, and the admissibility of documents.

Kelli Cubeta

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Ms. Cubeta will testify about her employment history, pre-billing review of potential vendors, contractual relationships with vendors, actions taken in response to threshold breaches, and the admissibility of documents.

Andrea Salinas

7411 John Smith Drive, Suite 1500, San Antonio, TX 78229

Testimony: Ms. Salinas will testify about the admissibility of documents BSG produced in response to the FTC's First Request for Production of Documents, Request 6.

Sally Welge

9826 Bushbuck Way, San Antonio, TX 78251

Testimony: Ms. Welge will testify about her employment duties and history, fellow employees' duties and responsibilities, LEC billing, pre-billing review of vendors, thresholds and threshold breaches, actions taken in response to threshold breaches, and the admissibility of documents.

Roberta Trevino

1519 Menefee Blvd., San Antonio, TX 78273

Testimony: Ms. Trevino will testify about her employment duties and history, fellow employees' duties and responsibilities, billing applications, pre-billing review of potential vendors, implementation, monitoring of vendors, and the admissibility of documents.

Greg M. Carter

3718 Verrado, San Antonio, TX 78261

Testimony: Mr. Carter will testify about his employment history, the corporate structure of BSG and its subsidiaries, LEC billing, pre-billing review of potential vendors, contractual relationships with vendors, actions taken in response to threshold breaches, and the admissibility of documents.

Cathy Coleman-Ackerman

7400 Jason Ave., West Hills, CA 91307

Testimony: Ms. Coleman-Ackerman will testify about her employment duties and history, fellow employees' duties and responsibilities, LEC billing, authorization, authentication and validation, and the admissibility of documents.

Beth Kimball

13 Larkspur Lane, St. Paul, MN 55127

Testimony: Ms. Kimball will testify about her employment duties and history, fellow employees' duties and responsibilities, pre-billing review of potential vendors, contractual relationships with vendors, and the admissibility of documents.

Michael Goldstein, Federal Trade Commission

600 Pennsylvania Ave. NW, Washington, DC 20580

Testimony: Mr. Goldstein will testify regarding the authenticity and admissibility of documents attached to the Declaration of Michael Goldstein filed on March 28, 2012.

E. Anne Miles, Federal Trade Commission

600 Pennsylvania Ave. NW, Washington, DC 20580

Testimony: Ms. Miles will summarize voluminous data provided by BSG, Smiley Media, and NXT, as reflected in the Declaration of E. Anne Miles filed on June 19, 2013.

Brian Percival, Federal Bureau of Investigations

8825 Nelson B. Klein Pkwy., Indianapolis, IN 46250

Testimony: Mr. Percival will testify regarding the authenticity and admissibility of documents attached to the Declaration of Brian Percival filed on March 28, 2012.

Stephen Oskoui, Smiley Media

701 Brazos St., Suite 1600, Austin, TX 78701

Testimony: Mr. Oskoui will testify regarding the authenticity and admissibility of documents attached to and described in the Declaration of Stephen Oskoui filed on March 28, 2012. Mr. Oskoui will also describe the marketing and data transmission services Smiley Media performed for CPA Market, as reflected in the Declaration of Stephen Oskoui.

Andrew Chen, Visa

900 Metro Center Blvd., Foster City, CA 94404

Testimony: Mr. Chen will describe Visa, Inc.'s fraud monitoring program, as reflected in the Declaration of Andrew Chen filed on March 28, 2012.

Lorraine McClin-Olriedge, ILD Corp.

5000 Sawgrass Village Circle, Ponte Vedra Beach, FL 32082

Testimony: Ms. McClin-Olriedge will testify regarding the authenticity and admissibility of documents.

Robert Zoch, NXT Telecommunications

2827 FM 1624, Giddings, TX 78942

Testimony: Mr. Zoch will testify regarding the authenticity and admissibility of documents.

Brett Healy, Rovi Corporation

2830 De La Cruz Blvd., Santa Clara, CA 95050

Testimony: Mr. Healy will testify regarding the authenticity and admissibility of documents.

The Federal Trade Commission reserves the right to offer testimony to rebut any expert subsequently named by Contempt Defendants. The Federal Trade Commission further reserves the right to call additional witnesses in rebuttal and to call or cross-examine any witnesses identified by Contempt Defendants.

NOTICE IS FURTHER GIVEN that the Federal Trade Commission shall rely on the following documentary evidence, copies of which previously have been provided to Contempt Defendants or are in Contempt Defendants' possession.

BSG Documents

Exhibit #	Description
	September 2000 Avery, HBS and Hold Billing Compliance Report to FTC
	Excerpt from Avery Communications, Inc. Schedule 14-C dated 2-14-2003, <i>available at</i> http://sec.gov
	July 2005 CID to BSG
	III.B.5 – 000001-8 (excerpt from BSG's response to July 2005 CID)
	III.B.5 – 000009-69 (excerpt from BSG's response to July 2005 CID)
	III.B.5 – 000184 (excerpt from BSG's response to July 2005 CID)
	III.B.5 – 000302-413 (excerpt from BSG's response to July 2005 CID)
	III.B.13.a – 000716-9 (excerpt from BSG's response to July 2005 CID)
	III.B.13.d – 001696-8 (excerpt from BSG's response to July 2005 CID)
	III.B.13.d – 001815 (excerpt from BSG's response to July 2005 CID)
	III.B.13.d – 001889-90 (excerpt from BSG's response to July 2005 CID)
	III.B.13.d – 001933-6 (excerpt from BSG's response to July 2005 CID)
	III.B.13.d – 001995 (excerpt from BSG's response to July 2005 CID)
	III.B.13.d – 002009-10 (excerpt from BSG's response to July 2005 CID)

Exhibit #	Description
	III.B.13.d – 002011-12 (excerpt from BSG’s response to July 2005 CID)
	III.B.13.d – 002013-14 (excerpt from BSG’s response to July 2005 CID)
	III.B.13.d – 002015-16 (excerpt from BSG’s response to July 2005 CID)
	III.B.13.d – 002017 (excerpt from BSG’s response to July 2005 CID)
	BSG00000089-5
	BSG00000773-4
	BSG00000854-5
	BSG00001039-41
	BSG00001042-8
	BSG00001139-6
	BSG00001218-26
	BSG00001235-41
	BSG00001259
	BSG00001264-5
	BSG00001341-3
	BSG00001380-1
	BSG00005026-32
	BSG00001460-73
	BSG00001501-6
	BSG00001507-12
	BSG00001567-71

Exhibit #	Description
	BSG00001593-603
	BSG00001666-75
	BSG00001711-4
	BSG00001725-31
	BSG00001807-9
	BSG00001836-47
	BSG00001848-61
	BSG00001938-46
	BSG00004725-9
	BSG00002077-9
	BSG00002144-59
	BSG00002842-57
	BSG00006388-95
	BSG00004470-4
	BSG00001947-52
	BSG00003979-86
	BSG00003999-4007
	BSG00005026-32
	BSG00005654-7
	BSG00008185-94
	BSG00008296-302

Exhibit #	Description
	BSG00009895
	BSG00009943
	BSG00016529-38
	BSG00017267-8
	BSG00018779
	BSG00019025-6
	BSG00019527-8
	BSG00019575-80
	BSG00019594-95
	BSG00019616-7
	BSG00019618-21
	BSG00019636-8
	BSG00019639
	BSG00019640
	BSG00024014-20
	BSG00024051-4
	BSG00024057-9
	BSG00024086-8
	BSG00024127-9
	BSG00024130-2
	BSG00024386

Exhibit #	Description
	BSG00024418-9
	BSG00024426-7
	BSG00024431
	BSG00024678-80
	BSG00024706-12
	BSG00024722-23
	BSG00024782
	BSG00025325
	BSG00026862-4
	BSG00026873-76
	BSG00026882-6
	BSG00027125
	BSG00027344
	BSG00027239-81
	BSG00027345
	BSG00027346
	BSG00027347
	BSG00027348
	BSG00027349-51
	BSG00027358
	BSG00027477-81

Exhibit #	Description
	BSG00027495
	BSG00027779-86
	BSG00027800-1
	BSG00027802-21
	BSG00027822-36
	BSG00027837-51
	BSG00027852-66
	BSG00027867-86
	BSG00027898-903
	BSG00027904-12
	BSG00027913-21
	BSG00027922
	BSG00027928
	BSG00027929
	BSG00027930
	BSG00027931
	BSG00027932
	BSG00027933
	BSG00027934
	BSG00027958-9
	BSG00027960-8

Exhibit #	Description
	BSG00027971-9
	BSG00027980-8
	BSG00027996-8004
	BSG00028009
	BSG00028155-6
	BSG00028353-60
	BSG00028561-2
	BSG00028563-5
	BSG00003823-32
	BSG00032286-318
	BSG00032536-7
	BSG00032999-33000
	BSG00033294-7
	BSG00033412-4
	BSG00033418-20
	BSG00033428-31
	BSG00033439-40
	BSG00033460-76
	BSG00034077-80
	BSG00034081-95
	BSG00034192-4

Exhibit #	Description
	BSG00034246
	BSG00034763-76
	BSG00035043-6
	BSG00035050-4
	BSG00035062-7
	BSG00035119-25
	BSG00035141-8
	BSG00035208
	BSG00035286
	BSG00035299-306
	BSG00036085-100
	BSG00035903-05
	BSG00035932-7
	BSG00035943-9
	BSG00035983-85
	BSG00037238
	BSG00038748-50
	BSG00039305-6
	BSG00039307-8
	BSG00039317-8
	BSG00039448-51

Exhibit #	Description
	BSG00039463
	BSG00039464-71
	BSG00039495
	BSG00039742
	BSG00039751
	BSG00039797-800
	BSG00039801
	BSG00040060-8
	BSG00040237
	BSG00040257-74
	BSG00040300
	BSG00040309-11
	BSG00040332-5
	BSG00040489
	BSG00040491
	BSG00040496-531
	BSG00040532-8
	BSG00040749-50
	BSG00040752-64
	BSG00040791-5
	BSG00040807-8

Exhibit #	Description
	BSG00040829-33
	BSG00040850-4
	BSG00040993-1083
	BSG00041121
	BSG00041798-800
	BSG00042119-31
	BSG00042296-315
	BSG00043580
	BSG00043957-8
	BSG00044108-9
	BSG00044429
	BSG00044484-6
	BSG00044492-4
	BSG00044497-9
	BSG00044502-4
	BSG00044516-7
	BSG00044525-6
	BSG00044554-6
	BSG00044790-1
	BSG00045077-84
	BSG00045085

Exhibit #	Description
	BSG00045089-91
	BSG00045161-2
	BSG00045186-8
	BSG00045189
	BSG00045190-91
	BSG00045208-09
	BSG00045273-4
	BSG00045874-5
	BSG00046266-9
	BSG00046278-80
	BSG00047105-7
	BSG00047612-4
	BSG00047767-9
	BSG00048067-9
	BSG00048070-2
	BSG00048166
	BSG00048335-6
	BSG00048888-9
	BSG00048975-9
	BSG00049129-68
	BSG00049265-7

Exhibit #	Description
	BSG00049351
	BSG00049352
	BSG00049353
	BSG00049354
	BSG00049355
	BSG00049356
	BSG00049376-83
	BSG00049386-90
	BSG00049391-6
	BSG00049397
	BSG00049409-15
	BSG00049494-5
	BSG00049496-9
	BSG00049527-8
	BSG00049546-8
	BSG00049554-6
	BSG00052783-5
	BSG00053815-47
	BSG00054085-99
	BSG00054101-8
	BSG00054256-66

Exhibit #	Description
	BSG00054273-4
	BSG00054304-12
	BSG00054391-9
	BSG00054480
	BSG00054481-5
	BSG00054486
	BSG00054487-91
	BSG00054492-7
	BSG00054512-8
	BSG00054520
	BSG00054668
	BSG00054811
	BSG00055022-54
	BSG00055524-5
	BSG00055937-9
	BSG00056331-40
	BSG00056661-5
	BSG00056583
	BSG00056585-6
	BSG00056621-9
	BSG00056651-4

Exhibit #	Description
	BSG00056672-82
	BSG00056683-86
	BSG00056692-700
	BSG00056938
	BSG00057831-3
	BSG00057835-7
	BSG00057695-7
	BSG00058568-9
	BSG00059894
	BSG00059898-900
	BSG00060010-24
	BSG00062963-4
	BSG00068166-9
	BSG00068244-7
	BSG00070794-6
	BSG00071654-61
	BSG00071701-2
	BSG00072894-939
	BSG00073198-203
	BSG00073657-8
	BSG00075075-6

Exhibit #	Description
	BSG00075296-98
	BSG00075474
	BSG00075458-9
	BSG00076869
	BSG00077100-3
	BSG00077958-62
	BSG00077963-4
	BSG00077965-72
	BSG00078447-74
	BSG00078975-76
	BSG00079020-3
	BSG00079770-2
	BSG00079952
	BSG0008144-9
	BSG00080881-3
	BSG00081285
	BSG00081327
	BSG00081623-4
	BSG00081745-7
	BSG00081979-80
	BSG00082631

Exhibit #	Description
	BSG00082858
	BSG00083003
	BSG00083046
	BSG00083176
	BSG00085795-7
	BSG00086387-8
	BSG00086389-90
	BSG00086522-4
	BSG00086585-6
	BSG00086600-02
	BSG00086805-983
	BSG00087214-26
	BSG00087262-318
	BSG00087540-3
	BSG00088684-702
	BSG00089246-8
	BSG00089249-51
	BSG00089252-4
	BSG00089255-7
	BSG00089258-60
	BSG00089261-3

Exhibit #	Description
	BSG00089264-6
	BSG00089328-42
	BSG00093255
	BSG00089358-89
	BSG00089390-413
	BSG00089414-42
	BSG00089443-70
	BSG00089472-99
	BSG00094682
	BSG00097265
	BSG00100540-42
	BSG00100549-50
	BSG00102762-90
	BSG00104994
	BSG00104995-5018
	BSG00105092
	BSG00016453-61
	BSG00016493-500
	BSG000165051-5
	BSG00016517-25
	BSG00016584-2

Exhibit #	Description
	BSG00016625-8
	BSG00016641-2
	BSG00016667-8
	BSG00016669-76
	BSG00016696-704
	BSG00016718-25
	BSG00016853-60
	BSG00017674-6
	BSG00018433-41
	BSG_Resp-I- p.00000021-40
	BSG_Resp-I- p.00000041-60
	BSG_Resp-I- p.00000061-80
	BSG_Resp-I- p.00000081-100
	BSG_Resp-I- p.00000121-40
	BSG_Resp-I- p.00000141-60
	BSG_Resp-I- p.00000195-214
	BSG_Resp-I- p.00000215-34
	BSG_Resp-I- p.00000255-274
	BSG_Resp-I- p.00000291-5
	BSG_Resp-I- p.00000302-07
	BSG_Resp-I- p.00000446-50

Exhibit #	Description
	BSG_Resp-I- p.00000457-62
	BSG_Resp-II-p.00000001-11
	BSG_Resp-II-p.00000012-37
	BSG_Resp-II-p.00000038-61
	BSG_Resp-II-p.00000062-89
	BSG_Resp-II-p.00000092-93
	BSG_Resp-II-p.00000094-95
	BSG_Resp-II-p.00000096-97
	BSG_Resp-II-p.00000102-3
	BSG_Resp-II-p.00000104-5
	BSG_Resp-II-p.00000108
	BSG_Resp-II-p.00000109-110
	BSG_Resp-II-p.00000111-12
	BSG_Resp-II-p.00000113-14
	BSG_Resp-II-p.00000115-16
	BSG_Resp-II-p.00000117
	BSG_Resp-II-p.00000118-39
	BSG_Resp-II-p.00000140-59
	BSG_Resp-II-p.00000188-96
	BSG_Resp-II-p.00000235-58
	BSG_Resp-II-p.00000197-204

Exhibit #	Description
	BSG_Resp-II-p.00000224-34
	BSG_Resp-II-p.00000283-95
	BSG_Resp-II-p.00000296-320
	BSG_Resp-II-p.00000321-31
	BSG_Resp-II-p.00000332-52
	BSG_Resp-II-p.00000353-63
	BSG_Resp-II-p.00000364-82
	BSG_Resp-II-p.00000383-91
	BSG_Resp-II-p.00000392-415
	BSG_Resp-II-p.00000421-22
	BSG_Resp-II-p.00000423-31
	BSG_Resp-II-p.00000432-55
	BSG_Resp-II-p.00000456-57
	BSG_Resp-II-p.00000458-60
	BSGRESPII0000001-10
	BSGRESPIII00000033-7
	BSGRESPIII00000038-42
	BSGRESPIII00000223-7
	BSGRESPIII00000290-3
	BSGRESPIII00000562-5
	BSGRESPIII00000566-7

Exhibit #	Description
	BSGRESPXVI00002747
	BSGRESPXVII00000001-37
	BSGRESPXVIII00002747-64
	BCI_026026-48
	BCI_026033-4
	BCI_026051-2
	BCI_026163-81
	BCI_026182-5
	BCI_026261-4
	BCI_026006-9
	BCI_026013-17
	BCI_026028-30
	Website captures from bsgclearing.com, filed as Docket Entries 55-48 and 55-49 (Goldstein Attachments A-B).

Other Documents

Exhibit #	Description
	Subpoena to ILD Corp., filed as Docket Entry 55-44 (Wolfe Attachment H)
	ILD Corp. documents filed as Docket Entry 55-44 (Wolfe Attachment H) (control numbers 0001, 0002-3, 0004-5, and 0581-2)
	Subpoena to NXT Telecommunications, Inc., filed as Docket Entry 55-45 (Wolfe Attachment I)
	Subpoena to Rovi Corporation, filed as Docket Entry 55-46 (Wolfe Attachment J)
	HBSDOC-00057568
	HBSDOC-0057569
	HBSDOC-0057570
	HBSDOC-0057571
	HBSDOC-0057572
	Documents from Smiley Media, filed as Docket Entries 55-51 and 55-52 (Goldstein Attachment D) (control numbers: 690, 1873, 2318, 2574, 4549, 4550, 4551, 4580, 4875, 5157, 5715, 5918, 6237, 6314, 6386, 6529, 6531, 6532, 6533, 6534, 6536, 6538, 6543, 6576, 6615, 6616, 6617, 6618, 6626, 6665, 6667, 6674, and 6735).
	Myemail.com Registration Flow, filed as Docket Entry 55-73 (Oskoui Attachment A)
	greatamericanphotocontest.com Registration Flow, filed as Docket Entry 55-73 (Oskoui Attachment B).
	HBSDOC-0001726
	HBSDOC-0004970
	HBSDOC-0005260
	HBSDOC-0006368

Exhibit #	Description
	HBSDOC-0006471
	HBSDOC-0006504
	HBSDOC-0009325
	HBSDOC-0009363
	HBSDOC-0009372
	HBSDOC-0010116
	HBSDOC-0010117
	HBSDOC-0010292
	HBSDOC-0058225-6
	1B056_ITEM 57-BINDER JUNE-MAY-MARCH-FEB 06-000001-3
	1B056_ITEM 57-BINDER JUNE-MAY-MARCH-FEB 06-000177-82
	1B056_ITEM 57-BINDER JUNE-MAY-MARCH-FEB 06-000186-91
	1B051_ITEM 32-CINDYS PAPERS_COPIES GIVEN BACK TO ME-000001-20
	1B071_ITEM 80-OLD MEMOS-000005
	1B071_ITEM 80-OLD MEMOS-000010
	1B071_ITEM 80-OLD MEMOS-000028
	1B071_ITEM 80-OLD MEMOS-000030
	1B071_ITEM 80-OLD MEMOS-000033
	1B071_ITEM 80-OLD MEMOS-000079
	1B071_ITEM 80-OLD MEMOS-000110
	1B071_ITEM 80-OLD MEMOS-000200

Exhibit #	Description
	1B071_ITEM 80-OLD MEMOS-000220-1
	1B071_ITEM 80-OLD MEMOS-000227
	1B071_ITEM 80-OLD MEMOS-000232
	1B071_ITEM 80-OLD MEMOS-000233-4
	1B057_ITEM 63-INSTANT411 CA-000071-2
	1B057_ITEM 63-INFOCALL-000067-8
	1B057_ITEM 63-ESAFEID CA-000044
	1B057_ITEM 63-DIGITALVMail CA-000060
	1B057_ITEM 63-800VMailBOX CA-000076
	1B057_ITEM 63-800VMailBOX CA-000108
	1B068_ITEM 71-BSG PERFORMANCE INDICATORS-000007-55
	1B066_ITEM 69-MISC DOCUMENTS-3-000040-3
	1B057_ITEM 63-VENDORS-000063-6
	1B063_ITEM 61-IDATAWORX 2009-000004-5
	1B063_ITEM 61-IDATAWORX 2009-000006-7
	1B063_ITEM 61-IDATAWORX 2009-000012-3
	1B063_ITEM 61-IDATAWORX 2009-000016-7
	1B063_ITEM 61-IDATAWORX 2009-000027-8
	1B063_ITEM 61-IDATAWORX 2009-000029-30
	1B063_ITEM 61-IDATAWORX 2009-000034-5
	1B063_ITEM 61-IDATAWORX 2009-000042-3

Exhibit #	Description
	1B063_ITEM 61-IDATAWORX 2009-000051-2
	1B055_ITEM 55-IDATAWORX LLC 2010-000006-7
	1B055_ITEM 55-IDATAWORX LLC 2010-000011-2
	F01-HBS-0000984-85
	F01-HBS-0000967
	F01-HBS-0000966
	F01-HBS-0001046
	F01-HBS-0000998
	F01-HBS-0000998
	F01-HBS0000997
	Senate Committee Report, <i>Unauthorized Charges on Telephone Bills</i>
	BSG 2011 Comment to FCC
	Excerpts of the record from <i>Lady Di's v. Enhanced Services Billing</i> (Docket Entry 23) from the Court of Appeals for the Seventh Circuit PACER docket
	Declaration and attachments of Elizabeth Anne Miles (Docket Entry 121)
	FTC PROD – HBS – 0003749-55
	FTC PROD – HBS – 0003756-61
	FTC PROD – HBS – 0003762-7
	FTC PROD – HBS – 0003768-72
	FTC PROD – HBS – 0003773-8
	FTC PROD – HBS – 0003779-83
	FTC PROD – HBS – 0003784-9

Exhibit #	Description
	FTC PROD – HBS – 0003790-4
	FTC PROD – HBS – 0003795-800
	FTC PROD – HBS – 0003801-8
	FTC PROD – HBS – 0003809-14
	FTC PROD – HBS – 0003815-24
	FTC PROD – HBS – 0003825-35
	FTC PROD – HBS – 0003836-43
	FTC PROD – HBS – 0003844-52
	FTC PROD – HBS – 0003853-9
	FTC PROD – HBS – 0003860-5
	FTC PROD – HBS – 0003866-74
	FTC PROD – HBS – 0003875-85
	FTC PROD – HBS – 0003886-94
	FTC PROD – HBS – 0003895-900
	FTC PROD – HBS – 0003901-8
	FTC PROD – HBS – 0003909-19
	FTC PROD – HBS – 0003920-30
	FTC PROD – HBS – 0003931-45
	FTC PROD – HBS – 0003946-53
	FTC PROD – HBS – 0003954-60
	FTC PROD – HBS – 0003961-7

Exhibit #	Description
	FTC PROD – HBS – 0003968-73
	FTC PROD – HBS – 0003974-9

The Federal Trade Commission reserves the right to rely on any and all documents listed on Contempt Defendants’ Witness and Exhibit List. The FTC further reserves the right to supplement or modify this list of documents based on further discovery or investigation conducted by Contempt Defendants. The Federal Trade Commission further reserves the right to supplement or modify this list of documentary evidence in response to Contempt Defendants’ production of additional documents and information, including, but not limited to documents or information produced as part of any expert report. The Federal Trade Commission further reserves the right to submit additional documentary evidence in cross-examination, rebuttal, or for impeachment.

Dated: September 3, 2013

/s/Robin L. Moore

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CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2013, I served via electronic mail the foregoing Witness and Exhibit List to the following:

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CERTIFICATE OF SERVICE

I certify that on September 24, 2013, a true and correct copy of the foregoing document was filed with the Clerk of Court using the CM/ECF system, which will send electronic notification to all counsel of record.

By: /s/ Robin L. Moore